

THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA,
NORTHERN DIVISION

A.G., a minor child, by and through her *
mother and next of friend, K.C.; D.A., a *
minor child, by and through her mother *
and next of friend, B.A.; A.L., a minor *
child, by and through her mother and *
next of friend, C.T.; M.K., a minor child, *
by and through her mother and next of *
friend, K.K.; and M.H., a minor child, by *
and through her mother and next of *
friend, B.H., *

* CASE NO.: 2:05-CV-1090-MEF

Plaintiffs,

v.

AUTAUGA COUNTY BOARD OF *
EDUCATION; JOSEPH L. BUTLER; and *
TERRY WRIGHT, *

Defendants.

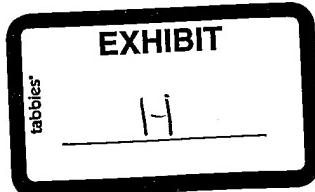
STATE OF ALABAMA)

COUNTY OF MONTGOMERY)

AFFIDAVIT OF MICHAEL J. CROW

Before me, the undersigned, a Notary Public in and for the State of Alabama at Large, personally appeared Michael J. Crow, who is known to me and who being by me first duly sworn, on oath deposes and says as follows:

My name is Michael J. Crow and I am over the age of nineteen years and reside in Mathews, Alabama.



I am lead co-counsel with Robert D. Drummond of a case currently pending before this court styled *A.G., a minor child, et al. v. Autauga County Board of Education, et al.* Case No.: 05-CV-1090.

On May 19, 2006, I received a phone call from a former Autauga County Board of Education employee. She informed me that she was a teacher with the Autauga County Board of Education and that she had been fired on May 12, 2006.

After a brief discussion, I asked her to meet with Mr. Drummond and me in my office later that day.

This employee met with Mr. Drummond and I that afternoon and had a discussion about the Board of Education's prior knowledge of Mr. Wright's conduct prior to October 29, 2004, which is the date of the incident involving all of the Plaintiff's in the case.

After having this discussion, it became clear to Mr. Drummond and I, as lawyers for Plaintiff's, that Defendant Cleveland had liability in this case and needed to be added as a Defendant.

This is the first time that Mr. Drummond and I became aware of Defendant Cleveland's conduct involving this case.



MICHAEL J. CROW

Sworn to and Subscribed before me on this 20th day of JUNE, 2006.



NOTARY PUBLIC

MY COMMISSION EXPIRES JUNE 16, 2010
MY COMMISSION EXPIRES JUNE 16, 2010